

**UNITED STATES DISTRICT COURT**  
**FOR THE SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK; STATE OF ARIZONA;  
STATE OF CALIFORNIA; STATE OF  
COLORADO; STATE OF CONNECTICUT;  
STATE OF DELAWARE; STATE OF HAWAII;  
STATE OF ILLINOIS; STATE OF MAINE;  
STATE OF MARYLAND; COMMONWEALTH  
OF MASSACHUSETTS; STATE OF  
MINNESOTA; STATE OF NEVADA; STATE OF  
NEW JERSEY; STATE OF NORTH CAROLINA;  
STATE OF OREGON; STATE OF RHODE  
ISLAND; STATE OF VERMONT; and STATE OF  
WISCONSIN,

Plaintiffs,

v.

DONALD J. TRUMP, IN HIS OFFICIAL  
CAPACITY AS PRESIDENT OF THE UNITED  
STATES; U.S. DEPARTMENT OF THE  
TREASURY; and SCOTT BESENT, IN HIS  
OFFICIAL CAPACITY AS SECRETARY OF U.S.  
DEPARTMENT OF THE TREASURY,

Defendants.

Case No. 1:25-cv-01144 (JAV)

**DECLARATION OF  
JAY C. RUSSELL IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
*PRO HAC VICE***

I, Jay C. Russell, do hereby declare:

1. I am an attorney licensed by the State of California. I am employed as a Deputy Attorney General with the California Department of Justice and serve as counsel of record for Plaintiff State of California in this matter.
2. I submit this declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.

3. As shown in the Certificate of Good Standing, attached hereto as **Exhibit A**, I was admitted to practice law in the State of California on April 10, 1986, and I am a member in good standing of the bar of the State of California (Bar No. 122626).

4. There are no pending disciplinary proceedings against me in any state or federal court.

5. I have never been convicted of a felony.

6. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

7. Wherefore, your declarant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in the above-captioned case in the United States District Court for the Southern District of New York for Plaintiff State of California.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 24, 2025

Respectfully submitted,

*s/ Jay C. Russell*

JAY C. RUSSELL  
*Deputy Attorney General*  
CALIFORNIA DEPARTMENT OF JUSTICE  
Office of the California Attorney General  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004  
Telephone: (415) 510-3617  
Fax: (415) 703-5843  
Email: Jay.Russell@doj.ca.gov

*Attorney for Plaintiff State of California*